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THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
AMARILLO DIVISION

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TERRA PARTNERS; TERRA XXI, LTD.; §  
ROBERT WAYNE VEIGEL; §  
ELLA MARIE WILLIAMS VEIGEL; §  
VEIGEL FARMS, INC.; §  
VEIGEL CATTLE COMPANY; and §  
VEIGEL FARM PARTNERS, §

Plaintiffs, §  
§  
v. §

AG ACCEPTANCE CORPORATION, §  
§  
Defendant. §

No. 2:15-cv-236-J  
Judge Robinson

**ROBERT WAYNE AND ELLA MARIE VEIGEL'S MOTION FOR IN CAMERA  
REVIEW OF PROTECTED ATTORNEY-CLIENT DOCUMENTS**

TO THE HONORABLE JUDGE:

COME NOW, Plaintiffs Robert Wayne and Ella Marie Veigel, on a limited *pro se* basis, and would show the Court as follows:

Plaintiffs' counsel of record, Keleher & McLeod, P.A. (Jeffery Dahl and Justin Breen) and the Law Office of Philip Roland Russ (Philip Russ) (together "Plaintiffs' Attorneys") have filed a Motion to Withdraw As Counsel (Dkt. #53) citing unspecified "irreconcilable differences" to such an extent that the Plaintiffs' Attorneys can no longer serve as Plaintiffs' counsel.

Plaintiffs Robert Wayne and Ella Marie Veigel (together "Movants") oppose the Motion to Withdraw and have made a *pro se* request of the Court to consent and allow Movants to file a response to the Motion to Withdraw as Movants (and other Plaintiffs) have been unable to retain new counsel as ordered by the Court (Dkt. #58).

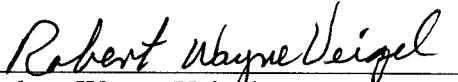
It opposition to the Motion to Withdraw, it is necessary for Movants to produce confidential, protected, and privileged attorney – client information to show that although the Plaintiffs have had differences with Plaintiffs’ Attorneys, Plaintiffs have always deferred to Plaintiffs’ Attorneys’ professional advise. As such, there are no “irreconcilable differences” between Plaintiffs and Plaintiffs’ Attorneys or any other valid justification for Plaintiffs’ Attorneys to be allowed to abandon their clients particularly at this late stage of the litigation and Plaintiffs’ significant investment of time, effort, and scarce financial resources.

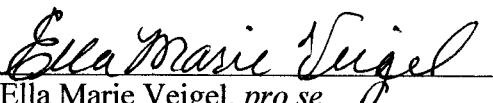
Therefore, Movants request that the Court conduct an *in camera* review of the documents provided by the Appendix to this Motion in support of Movants’ opposition to the Motion to Withdraw in such a manner that honors and protects Movants’ privileged attorney – client information to ensure that such privilege cannot be deemed waived by the Defendant.

#### PRAAYER

WHEREFORE, PREMISES CONSIDERED, Movants pray that the Court grant this Motion, and for such and further relief that may be awarded at law or in equity.

Respectfully submitted,

  
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**CERTIFICATE OF SERVICE**

THIS HEREBY CERTIFIES that on March 23, 2016, a copy of this Motion without the Appendix was e-mailed to the following:

**Lead Counsel for Plaintiffs:**

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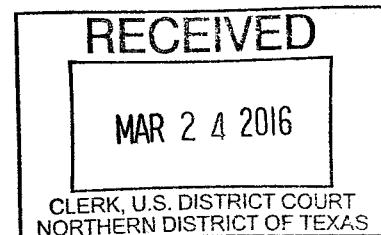
Robert Wayne Veigel  
Robert Wayne Veigel, *pro se*

**Robert Wayne and Ella Marie Veigel**

105 Quince St.  
Hereford, Texas 79045

March 23, 2016

The Clerk for the  
United States District Court  
Northern District of Texas  
205 E. Fifth Street, Unit 13240  
Amarillo, Texas 79101



Re: Cause No. 2:15-cv-236-J; Terra Partners, et al. v. AG Acceptance Corporation In  
the United States District Court, Northern District of Texas, Amarillo Division

Dear Clerk:

Pursuant to the Court's order of March 18, 2016 (Dkt. #62) please file the  
enclosed Robert Wayne and Ella Marie Veigel's Response to Motion to Withdraw.

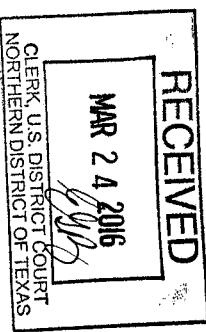
Pursuant to the Court's order of March 21, 2016 (Dkt. #64) please file the  
enclosed Robert Wayne and Ella Marie Veigel's Motion For *In Camera* Review Of  
Protected Attorney-Client Documents. I have previously submitted the proposed  
Appendix to this motion containing privileged/protected attorney-client documents to  
Judge Robinson by a letter dated February 29, 2016. If I correctly understand the Court's  
order, I am not submitting the Appendix for public filing unless further expressly ordered  
so as to not waive the attorney-client privilege.

Robert Wayne Veigel  
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cell: (806) 231-1008

Enclosures::

Robert Wayne and Ella Marie Veigel's Response to Motion to Withdraw  
Robert Wayne and Ella Marie Veigel's Motion for In Camera Review

Bob Neigel  
105 Quince  
Layland Tex 79055



The Clerk for the  
United States District Court  
Northern District Texas  
205 E. First Street, Unit 13240  
Amarillo, Texas 79101



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